

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

INA STEINER, DAVID STEINER, and)	
STEINER ASSOCIATES, LLC,)	
)	
Plaintiffs,)	Civil Action No. 21-CV-11181-PBS
)	
v.)	
)	
EBAY INC., et al.,)	
)	
Defendants.)	
)	

DECLARATION OF JACK W. PIROZZOLO, ESQ.

I, Jack W. Pirozzolo, hereby depose and say as follows:

1. I submit this declaration in support of eBay Inc.'s ("eBay") Response to Plaintiffs' Statement of Proposed Undisputed Facts. Unless otherwise noted, the statements set forth herein are based on my own personal knowledge. They are also true to the best of my knowledge, information, and belief as of the date I signed this declaration.

2. I am a partner with the law firm of Sidley Austin LLP and counsel of record for eBay in the above-captioned matter.

3. Attached hereto as Exhibit 1 is a true and correct copy of Defendant Cooke's promotion history, EBAY_STEINER_00186800.

4. Attached hereto as Exhibit 2 is a true and correct copy of a May 22, 2019 email from Stephanie Stockwell to Jim Baugh, EBAY_STEINER_00042191.

5. Attached hereto as Exhibit 3 is a true and correct copy of the April 15, 2019 "GSOC Situational Report," EBAY_STEINER_00092666.

6. Attached hereto as Exhibit 4 is a true and correct copy of screenshots of a July 19, 2019 text message exchange with Dan Cory, WENIG_0000694.

7. Attached hereto as Exhibit 5 is a true and correct copy of Defendant Cooke's termination letter, EBAY_STEINER_00137592.

8. Attached hereto as Exhibit 6 is a true and correct copy of Defendant Alford's offer letter, EBAY_STEINER_00199069.

I declare, under the pains and penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed, February 14, 2025, in the Commonwealth of Massachusetts, United States of America.

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2025, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: February 14, 2025

/s/ Jack W. Pirozzolo
Jack W. Pirozzolo